## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS VICTORIA DIVISION

In re:	) Case No. 22-60020
INFOW, LLC, et al.,	Chapter 11 (Subchapter V)
Debtors. <sup>1</sup>	) Jointly Administered

## NOTICE OF AMENDED AND RESTATED DECLARATION OF TRUST AND PLAN SUPPORT AGREEMENT

[Relating to ECF No. 6]

PLEASE TAKE NOTICE that on April 18, 2022, the above-captioned debtors and debtors-in-possession (the "Debtors") filed the Debtors' Emergency Motion for Order Authorizing Appointment of Russell F. Nelms and Richard S. Schmidt as Trustees of the 2022 Litigation Settlement Trust and Granting Related Relief [ECF No. 6] (the "Trustee Motion").<sup>2</sup>

PLEASE TAKE FURTHER NOTICE that after negotiations among the proposed Trustees, the Debtors, and the Third-Party Funding Contributors, the parties have agreed to amended and restated versions of the Declaration of Trust and Plan Support Agreement attached to the Trustee Motion (as amended and restated, the "Amended and Restated Plan Support Agreement").

PLEASE TAKE FURTHER NOTICE that the Amended and Restated Declaration of Trust is attached hereto as **Exhibit A** hereto. The changes to the Declaration of Trust are reflected in **Exhibit B** hereto.

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases along with the last four digits of each Debtor's federal tax identification number are as follows: InfoW, LLC, f/k/a Infowars, LLC (6916), IWHealth, LLC f/k/a Infowars Health, LLC (no EIN), Prison Planet TV, LLC (0005). The address for service to the Debtors is PO Box 1819, Houston, TX 77251-1819.

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not defined herein have the meanings ascribed to such terms in the Trustee Motion.

PLEASE TAKE FURTHER NOTICE that the Amended and Restated Plan Support Agreement is attached hereto as **Exhibit C** hereto. The changes to the Plan Support Agreement are reflected in **Exhibit D** hereto.

PLEASE TAKE FURTHER NOTICE that the proposed Trustees have agreed to enter into the Amended and Restated Plan Support Agreement and Amended and Restated Plan Support Agreement upon entry of an order authorizing their appointment pursuant to the Trustee Motion.

Dated: April 29, 2022

## PARKINS LEE & RUBIO LLP

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Proposed Counsel to the Debtors and Debtors-in-Possession

## **CERTIFICATE OF SERVICE**

I hereby certify, a true and correct copy of the foregoing document was served (a) by the Court's CM/ECF system on all parties registered to receive such service and (b) on the following parties by email:

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/s/ R. J. Shannon

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